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7 Attorney for U.S. Bank National Association,
8 as Trustee, on behalf of the holders of
9 Adjustable Rate Mortgage Trust 2007-2
10 Adjustable Rate Mortgage-Backed Pass-
11 Through Certificates, Series 2007-2, and
12 its loan servicing agent, Select Portfolio
13 Servicing, Inc.

The Honorable Patricia C. Williams
Chapter 7
Response Date: January 14, 2011

10 **UNITED STATES BANKRUPTCY COURT FOR THE**
11 **EASTERN DISTRICT OF WASHINGTON**
12 **AT SPOKANE**

12 In re:

13 ANGELA UKPOMA,

14 Debtor.

NO. 10-06815

**NOTICE OF MOTION FOR
RELIEF FROM STAY AND
ABANDONMENT OF REAL
PROPERTY AND DISTRICT
COURT LAWSUIT**

19 TO: Angela Ukpoma, *Pro Se*;
20 AND TO: All Parties on the Master Mailing List and Creditors listed in the
21 Debtor's Schedules D, E and F;
22 AND TO: Bruce Boyden, Chapter 7 Trustee;
23 AND TO: U.S. Trustee.

24 PLEASE TAKE NOTICE that secured creditor U.S. Bank National
25 Association, as Trustee, on behalf of the Holders of Adjustable Rate Mortgage
26

1 Trust 2007-2 Adjustable Rate Mortgage-Backed Pass Through Certificates,
2 Series 2007-2 (the "Trust"), and its loan servicing agent, Select Portfolio
3 Servicing, Inc. ("SPS"), have moved this Court for an order terminating the
4 automatic stay of 11 U.S.C. §362(a), and abandoning property of the estate.
5 The real property against which the moving parties seek relief is located at
6 1123 Highway 395 North, Kettle Falls, Washington 99141, and legally
7 described as follows:

8 Parcel No. 1700800:

9 The W1/2 of the W1/2 of the W1/2 of the NW1/4 of
10 the SW1/4, lying Southwest of Primary State Highway
11 No. 3, in Section 13, Township 36 North, Range 37
East W.M., in Stevens County, Washington.

12 EXCEPT that portion conveyed to the State of
13 Washington for PSH No. 395 by Deed recorded
14 August 1, 1980, under Auditor's File No. 498482.

15 Together with that portion of the NW1/4 of the SW1/4
16 of the SW1/4, lying Northerly of the centerline of
17 private easement road as shown and described in the
18 Mutual Easement recorded May 4, 1982, in Volume
19 71, page 1514, under Auditor's File No. 516419, in
Section 13, Township 36 North, Range 37 East, W.M.,
in Stevens County, Washington.

20 EXCEPT commencing at the Northwest corner of the
21 SW1/4 of the SW1/4 of said Section 13; thence North
22 86°03' East along the North line of the said SW1/4 of
23 the SW1/4, 170.00 feet to the True Point of
24 Beginning; thence South 02°49' East 209.00 feet;
thence North 86°03' East 209.00 feet; thence North
02°49' West 209.00 feet; thence South 86°03' West
209.00 feet to the True Point of Beginning.

1 ALSO EXCEPT beginning at a point 379.00 feet East
2 of the Northwest corner of said NW1/4 of the SW1/4
3 of the SW1/4 of said Section 13; thence East 281.00
4 feet along the East line of said subdivision to the
5 Northeast corner thereof; thence South 660.00 feet
6 along the East line of said subdivision; thence West
7 660.00 feet along the South line of said subdivision;
8 thence North 451.00 feet along the West line of said
9 subdivision; thence East parallel with the South line of
10 said subdivision 379.00 feet; thence North parallel
11 with the East line of said subdivision 209.00 feet to
12 the Point of Beginning.

13 (the "Property"). The motion also seeks relief from stay and abandonment of
14 the claims asserted by Angela Ukpoma against SPS in the matter of *Ukpoma v.*
15 *Select Portfolio Servicing, Inc.*, pending in the United States District Court for
16 the Eastern District of Washington, entitled, Case No. 10-00420-LRS (the
17 "District Court Lawsuit").

18 Copies of the pleadings and papers filed in support of this motion may
19 be obtained at the United States Bankruptcy Court Clerk's office, or by
20 contacting Mark Bailey at the address listed below.

21 Pursuant to a Broker's Price Opinion obtained by SPS dated June 9,
22 2010, the Property has a value of \$212,000. The Debtor has scheduled the
23 Property with a value of \$250,000. As of December 27, 2010, the total
24 secured loan payoff owed by the Debtor to the Trust was \$350,563.70. The
25 Debtor has also listed a federal tax lien on the Property in the amount of
26 \$610,862.88 in her schedules.

PLEASE TAKE FURTHER NOTICE that if you object to the granting
of the above-described motion, you must file your written objection, stating

1 the grounds therefore as required by Local Bankruptcy Rule 2002-1(f), and a
2 request for hearing, with the Clerk of the above-entitled Court at Room 321,
3 United States Post Office Building, 904 West Riverside, P.O. Box 2164,
4 Spokane, Washington 99210, and serve copies of the objection and request for
5 hearing on the undersigned counsel, the Chapter 7 Trustee, Bruce Boyden, 621
6 West Mallon, Suite 607, Spokane, Washington 99201, and the U.S. Trustee,
7 920 West Riverside, Room 593, Spokane, Washington 99201, on or before
8 **Friday, January 14, 2011.** A hearing on your objection will then be
9 scheduled.

10 SHOULD YOU FAIL TO OBJECT within the time set forth above,
11 relief as requested may be granted without further notice to you. If you have
12 no objection, you need not take any action.

13 DATED this 27th day of December, 2010.

14
15 /s/ Mark A. Bailey

16 Mark A. Bailey, WSBA No. 26337

17 BERESFORD BOOTH PLLC

18 145 Third Ave. S, Suite 200

19 Edmonds, WA 98020

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22 markb@beresfordlaw.com

23 *Attorney U.S. Bank National*
24 *Association, as Trustee, on behalf of*
25 *the holders of Adjustable Rate*
26 *Mortgage Trust 2007-2 Adjustable*
Rate Mortgage-Backed Pass-Through
Certificates, Series 2007-2, and its
loan servicing agent, Select Portfolio
Servicing, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all participants of the CM/ECF system, including:

Bruce R. Boyden (Trustee)

BRBat509@aol.com

WA01@ecfcbis.com

US Trustee

USTP.REGION18.SP.ECF@usdoj.gov

I further certify that the foregoing was mailed to all Parties on the Master Mailing List and Creditors listed in the Debtor's Schedules D, E and F, via U.S. Mail to:

Angela Ukpoma P.O. Box 1075 Kettle Falls, WA 99141	Angela Ukpoma 1123 Highway 395 North Kettle Falls, Washington 99141	Bruce R. Boyden Law Offices of Bruce R. Boyden 621 W Mallon, Ste. 607 Spokane, WA 99201- 2181
Chrysler Financial 2777 Inkster Rd Farmington Hills, MI 48334-5326	Internal Revenue Service Centralized Insolvency Operations P.O. box 21126 Philadelphia, PA 19114-0326	Quality Loan Service Corp. of Washington 19735 10 th Ave. NE, Ste. N-200 Poulsbo, WA 98370- 7478
State of Washington Department of Revenue 2101 4 th Ave., Ste. 1400 Seattle, WA 98121- 2300	US Bank National as Trustee 60 Livingston Ave EP MN WS3D St Paul, MN 55107- 2292	US Trustee US Court House 920 W Riverside Ave, Ste. 593 Spokane, WA 99201- 1012

Chrysler Financial P.O. Box 9223 Farmington Hills, MI 48333	Triburon Financial, LLC P.O. Box 770 Boystown, NE 68010	Jomax Recovery Services 20325 N. 51 st Ave., Ste. 134 Glendale
BECU P.O. Box 97050 Seattle, WA 98124	Assoc Credit Services 12815 E Sprague Ave, Ste. 200 Spokane, WA	Mercantile Adjustment Bureau P.O. Box 9016 Williamsville, NY 14231
Bank of America 4161 Piedmont PKWY NC4-105-01- 34 Greensboro, NC	Bank of America 4161 Piedmont PKWY NC4-105-02-51 Greensboro, NC	IC Systems, Inc. P.O. Box 64378 Saint Paul, MN 55164

DATED this 27th day of December, 2010, at Edmonds, Washington.

/s/ Mark A. Bailey

Mark A. Bailey
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